

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LEADENHALL CAPITAL PARTNERS LLP
and LEADENHALL LIFE INSURANCE
LINKED INVESTMENTS FUND PLC,

Plaintiffs,

v.

JOSH WANDER, STEVEN PASKO,
KENNETH KING, 777 PARTNERS LLC, 600
PARTNERS LLC, SPLCSS III LLC, SIGNAL
SML 4 LLC, INSURETY AGENCY
SERVICES LLC, DORCHESTER
RECEIVABLES II LLC, SUTTONPARK
CAPITAL LLC, SIGNAL MEDICAL
RECEIVABLES LLC, INSURETY CAPITAL
LLC, SUTTONPARK SERVICING LLC, and
ADVANTAGE CAPITAL HOLDINGS LLC,

Defendants.

Civil Action No. 1:24-cv-03453

DECLARATION OF JONATHAN WATKINS

I, Jonathan Watkins, hereby declare as follows:

1. I am an attorney at Cadwalader, Wickersham & Taft LLP and counsel for Advantage Capital Holdings LLC and Kenneth King (collectively, “the A-CAP Defendants”) in this matter.
2. I submit this Declaration in support of A-CAP Defendants’ Letter Motion to the Court to formally seal certain documents or portions of documents filed by Plaintiffs on May 1, 2025 (Dkt. Nos. 281, 282).
3. Attached hereto as Exhibit 1 is a true and correct copy of Leadenhall’s Motion for Contempt Against Guarantors, A-CAP, and Kenneth King, Dkt. No. 281, with A-CAP Defendants’ proposed redactions of confidential material.

4. Attached hereto as Exhibit 2 is a true and correct copy of July 7, 2024 emails filed as Exhibit A to the Declaration of Leigh Nathanson at Dkt. Nos. 282-1 and 284-1, proposed by A-CAP Defendants to be filed under seal.

5. Attached hereto as Exhibit 3 is a true and correct copy of the Deposition Mark Shapiro, dated March 26, 2025, filed as Exhibit H to the Declaration of Leigh Nathanson at Dkt. Nos. 282-8 and 284-8, proposed by A-CAP Defendants to be filed under seal.

6. Attached hereto as Exhibit 4 is a true and correct copy of an Agreement, filed as Exhibit J to the Declaration of Leigh Nathanson at Dkt. Nos. 282-10 and 284-10, proposed by A-CAP Defendants to be filed under seal.

7. Attached hereto as Exhibit 5 is a true and correct copy of a sealed December 2, 2024 order, filed as Exhibit M to the Declaration of Leigh Nathanson at Dkt. Nos. 282-13 and 284-13, proposed by A-CAP Defendants to be filed under seal.

8. Attached hereto as Exhibit 6 is a true and correct copy of a sealed December 20, 2024 order, filed as Exhibit N to the Declaration of Leigh Nathanson at Dkt. Nos. 282-14 and 284-14, proposed by A-CAP Defendants to be filed under seal.

9. Attached hereto as Exhibit 7 is a true and correct copy of a sealed March 21, 2025 petition, filed as Exhibit O to the Declaration of Leigh Nathanson at Dkt. Nos. 282-15 and 284-15, proposed by A-CAP Defendants to be filed under seal.

10. Attached hereto as Exhibit 8 is a true and correct copy of a sealed February 6, 2025 memorandum, filed as Exhibit P to the Declaration of Leigh Nathanson at Dkt. Nos. 282-16 and 284-16, proposed by A-CAP Defendants to be filed under seal.

11. Attached hereto as Exhibit 9 is a true and correct copy of a sealed August 2024 presentation, filed as Exhibit Q to the Declaration of Leigh Nathanson at Dkt. Nos. 282-17 and 284-17, proposed by A-CAP Defendants to be filed under seal.

12. Attached hereto as Exhibit 10 is a true and correct copy of a sealed November 2024 presentation, filed as Exhibit R to the Declaration of Leigh Nathanson at Dkt. Nos. 282-18 and 284-18, proposed by A-CAP Defendants to be filed under seal.

13. Attached hereto as Exhibit 11 is a true and correct copy of the Deposition of Mark Shapiro, dated March 5, 2025, filed as Exhibit Y to the Declaration of Leigh Nathanson at Dkt. Nos. 282-25 and 284-25, proposed by A-CAP Defendants to be filed under seal.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 5, 2025

/s/ Jonathan M. Watkins
Jonathan M. Watkins